

KEVIN G. HORBATIUK (KGH-4977)
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CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.,
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(212) 482-0001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION**

21 MC 102 (AKH)

-----X
LUDIVIA CASTELLENOS and LUIS L. MARTINEZ,

**DOCKET NO:
07 CV 1480**

Plaintiffs,

-against-

**100 CHURCH, LLC, 222 BROADWAY, LLC
ALAN KASMAN DBA KASCO, AMBIENT
GROUP, INC., AMG REALTY PARTNERS, L.P.,
ANN TAYLOR STORES CORPORATION,
BATTERY PARK CITY AUTHORITY, BELFOR USA
GROUP, INC., BFP ONE LIBERTY PLAZA CO., LLC.,
BLACKMON-MOORING STEAMATIC CATASTOPHE,
INC., d/b/a BMS CAT, BOARD OF EDUCATION OF
THE CITY OF NEW YORK, BROOKFIELD
FINANCIAL PROPERTIES, INC., BROOKFIELD
FINANCIAL PROPERTIES, L.C., BROOKFIELD
PARTNERS, L.P., BROOKFIELD PROPERTIES
CORPORATION, BROOKFIELD PROPERTIES
HOLDINGS, INC., CHASE MANHATTAN BANK
CORPORATION, CUNNINGHAM DUCT CLEANING CO.,
CUSHMAN & WAKEFIELD, INC., DEPARTMENT OF
BUSINESS SERVICES, ENVIROTECH CLEAN
AIR, INC., GPS ENVIRONMENTAL CONSULTANTS, INC.,
HILLMAN ENVIRONMENTAL GROUP, LLC
INDOOR AIR PROFESSIONALS, INC.,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
JONES LANG LASALLE AMERICAS, INC.,**

**NOTICE OF
ADOPTION OF
ANSWER TO
MASTER COMPLAINT**

JONES LANG LASALLE SERVICES, INC.,
KASKO RESTORATION SERVICES CO., LAW
ENGINEERING, P.C., MERILL LYNCH & CO.,
INC., NEW YORK CITY SCHOOL
CONSTRUCTION AUTHORITY, NEW YORK
UNIVERSITY, NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL, INC.,
ROYAL AND SUNALLIANCE INSURANCE
GROUP, PLC., SAKALE BROTHERS, LLC
STRUCTURE TONE (UK), INC., STRUCTURE TONE
GLOBAL SERVICES, INC., SWISS BANK
CORPORATION, THAMS REALTY CO.,
TOSCORP INC., TRC ENGINEERS, INC.,
TRIBECA LANDING LLC WESTON
SOLUTIONS, INC., WFP TOWER B CO., G.P.,
CORP., WFP TOWER B HOLDING CO., L.P.,
WFP TOWER B CO., L.P., WFP TOWER D CO.,
G.P., CORP., WFP TOWER D HOLDING CO. I
L.P., WFP TOWER D HOLDING CO., II L.P.,
WFP TOWER D HOLDING I G.P., CORP.,
WFP TOWER D CO., L.P., and ZAR REALTY
MANAGEMENT CORP.,

Defendants.

.....X

PLEASE TAKE NOTICE, that defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC., ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102(AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
January 31, 2008

Kevin G. Horbatiuk
Kevin G. Horbatiuk (KGH4977)
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TO: CHRISTOPHER R. LaPOLA, ESQ.,
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CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 31st day of January, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
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